



Park 80 West-Plaza One (201) 845-9600 Main
250 Pehle Avenue (201) 845-9423 Fax
Suite 401
Saddle Brook, NJ 07663

Matthew F. Gately, Esq.
mfg@njlawfirm.com
Direct Line: (551) 497-7189

March 19, 2024

VIA ECF

The Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Bldg. & U.S. Courthouse
402 East State Street, Room 7W
Trenton, New Jersey 08608

Re: Joint Letter Regarding Disputed Confidentiality Order Provisions
In re Insulin Pricing Litigation, MDL No. 3080
Case No. 2:23-md-3080-BRM-RLS

Dear Judge Singh:

Pursuant to Your Honor's March 13, 2024, letter order, the parties hereby jointly submit a proposed discovery confidentiality order consistent with Your Honor's ruling.

Respectfully Submitted,

/s/ Matthew F. Gately
Matthew Gately
Counsel for the
Third-Party Payer Class Track

/s/ Tanya Ellis
Tanya Ellis
Counsel for the
State Attorney General Track

/s/ Brandon Bogle
Brandon Bogle
Counsel for the
Self-Funded Payer Track

/s/ Kelley Barnaby
Kelley Barnaby
Counsel for
OptumRx

/s/ Patrick Harvey
Patrick Harvey
Counsel for
Express Scripts.

/s/ Joshua Podoll
Joshua Podoll
Counsel for
CVS Caremark

/s/ Andrew Yaphe
Andrew Yaphe
Counsel for
Novo Nordisk

/s/ Liza Walsh
Liza Walsh
Counsel for
Sanofi-Aventis

/s/ Ryan Moorman
Ryan Moorman
Counsel for
Eli Lilly